

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

OCT 10 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

V.

JEREMIAH RICHARDSON,

Defendant.

No.

4:19CR857 HEA/NCC

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and John Bird, Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with one count of being a felon in possession of a firearm in violation of Title 18, United States Code, Section 922(g)(1).
2. According to St. Louis Metropolitan Police Department Complaint Number 19-041852, on August 25, 2019 at approximately 12:30 PM, Anti-Crime Task Force (ACTF) detectives were alerted to a stolen 2009 Dodge Ram pickup truck being driven near Jennings Station Road and Interstate 70. The detectives responded to the area and set up a rolling surveillance on the stolen truck. The detectives were eventually able to deploy spike strips, deflating two tires on the truck. The driver J.S. sped off from the detectives. During the police pursuit, detectives observed Defendant, the front seat passenger, discard a loaded Smith & Wesson make, .40 caliber, semi-automatic pistol out the passenger window. Defendant eventually bailed out of the stolen truck and fled from the detectives on foot. Defendant was

subsequently taken into custody and arrested. A search of Defendant revealed approximately 12.88 grams of marijuana in his pants pocket.

3. Defendant has numerous prior felony convictions from St. Louis County, Missouri, to include: Tampering 1st degree in Cause Number 15SL-CR2601; Stealing a Motor Vehicle in Cause Number 15SL-CR2786; Burglary 2nd degree and Stealing in Cause Number 15SL-CR2789; Attempt Burglary 1st degree and Resisting Arrest in Cause Number 15SL-CR2792; Burglary 2nd degree (2 counts) and Stealing (2 counts) in Cause Number 15SL-CR2917; Burglary 2nd degree (2 counts), Burglary 1st degree (2 counts), Stealing (2 counts) and Attempt Burglary 1st degree in Cause Number 15SL-CR2920; and Burglary 2nd degree and Stealing in Cause Number 15SL-CR3674. It appears Defendant was on parole for all of the above offenses at the time of this incident.

4. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against Defendant, the Defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by Defendant's release warrant Defendant's detention pending trial.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

s/ John Bird

JOHN BIRD, #37802MO
Assistant United States Attorney